

201-16227



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03/29/2006 12:14 PM

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Subject Environmental Defense comments on 3,
4-Dichloro-alpha, alpha, alpha-trifluorotoluene (CAS#
328-84-7)

(Submitted via Internet 3/29/06 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov,
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ggarvin@dow.com)

Environmental Defense appreciates this opportunity to again submit comments on the robust summary/test plan for **3, 4-Dichloro-alpha, alpha, alpha-trifluorotoluene (CAS# 328-84-7)**, now that a more complete submission has been posted.

The Dow Chemical Company, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing data for 3, 4-Dichloro-alpha, alpha, alpha-trifluorotoluene (DCTFT).

A test plan for this chemical was originally submitted in January of 2004. According to the sponsor, robust summaries were not included with the original submission because DCTFT had been recently purchased from Rohm and Hass Company, and the sponsor was working with members of a disbanded consortium to obtain existing data, hence requiring additional time for the preparation and submission of robust summaries.

On review of the current submission, it is disappointing to see that the original test plan, which contained little information other than a list of the SIDS elements required for compliance with the HPV Challenge and was clearly inadequate, has not been updated. In addition, the recently submitted robust summaries should be significantly revised to clearly and concisely address EPA guidelines. At present the robust summaries contain numerous pages consisting simply of headings with no supported data. Some of the studies discussed are described in far more detail than needed, while other SIDS elements remain to be addressed. The following is a list of some of the SIDS elements requested under the HPV Challenge that do not appear to be adequately addressed by the present submission.

1. Neither the original test plan nor the robust summaries providing a basic SIDS element, the structural formula of DCTFT.
2. No information is provided to address the production and/or import or transport of DCTFT.
3. No sources of occupational or environmental exposure are listed for this chemical.

4. The chemical/physical properties listed for DCTFT are minimal, were not determined under GLP and do not include data for the partition coefficient.
5. Data for Environmental Fate and Pathways do not include data for stability in water or soil or transport and distribution between environmental compartments.
6. It appear that most of the studies of toxicity to fish and invertebrates were conducted at concentrations that exceeded the water solubility of DCTFT, and hence most of the actual exposure concentrations were very similar.
7. The Repeated Dose studies described in Section 5.4 are of limited value. The first study described is listed as "invalid", the second had problems with corn oil dilutions of the test material and is considered by the sponsor as "valid with restrictions," and only the methods, not the results, were described for the third study. However, we believe the results of the reproductive/developmental study, which was conducted under GLP, could also adequately address the requirement for a repeated dose toxicity study if it were presented in that manner. Therefore, we do not believe conducting a new repeated dose test is necessary.

In summary, the present submission still needs considerable work to be acceptable. At a minimum, the test plan should provide a brief summary of available chemical and toxicological data and a description of additional work that needs to be done. The robust summaries should be revised to eliminate pages containing no information.

Thank you for this opportunity to comment.

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